

DATE: 14/SEP/1999

SUBJECT: **PRODUCT CHEMISTRY REVIEW OF: Manufacturing-Use [] End-Use Product [X]**
BARCODE No.: 257084 EPA RECEIVED DATE: 22/DEC/1998 REG./File Symbol No.: 63588-RR
PRODUCT NAME: Apogee Plant Growth Regulator, 27.5% Prohexadione calcium MRID.: 447252-03
COMPANY NAME: K-I Chemical U.S.A., Inc Action Code: 100

FROM: Sami Malak, Chemist *S. Malak*
Technical Review Branch/RD (7505C)

TO: 22 Cynthia Giles-Parker/Thomas Ellwanger
Fungicide Branch/RD (7505C)

INTRODUCTION:

In a Telefax dated 18/UN/1999, the applicant responded to EPA letter of 10/JUN/1999 seeking FIFRA Section 3(c)(5) registration of subject product. With this re-submission, the applicant included product chemistry data, information on one inert ingredient, product's label, and CSFs, a basic and one alternate formulation both dated 07/DEC/1998. In a previous memorandum information was requested for one inert ingredient in the alternate formulation, and additional data pertaining to GRNs 830-1550, 830-1750 & 830-6320 (D #252488, S. Mathur, 05/APR/1999).

FINDINGS:

1. The subject end-use product is produced by an integrated production system meaning that the technical source is not registered. Full generic data, however, was previously submitted and reviewed in connection with reg. No. 63588-RN (D#253852, H. Podall, 20/MAY/1999). The subject product contains 27.5% Prohexadione calcium [Cyclohexanecarboxylic acid, 3,5-dioxo-4-(1-oxopropyl)-,ion(1-)-calcium, calcium salt], CAS #127277-53-6, 91% pure.
2. The submitted product chemistry data pertaining to product's identity and certified limits, GRNs 830-1550 & 830-1750, is adequate. The submitted information in MRID #447252-03 is consistent with the composition and certified limits stated on the alternate formulation, CSF dated 07/DRC/1998.
3. The applicant re-submitted MRID #447252-03 containing the required information on one inert ingredient in the alternate formulation, CSF dated 07/DEC/1998. It was apparent that this information was previously submitted but not reviewed.
- 4a. The submitted product's CSFs, a basic and one alternate formulation both dated 07/DEC/1998 were filled out correctly and completely and agree with the label claim nominal concentration as per the regulations of PR Notice 91-2. Further, the upper and lower certified limits are within the standard limits of 40CFR§158.175(b)(2).

- 4b. All ingredients claimed on the CSFs, including the ingredient in the alternate formulation, are cleared for use in pesticide formulations intended for food uses.
- 6a. The label claim nominal concentration of 27.5% Prohexadione calcium is consistent with that on the CSF, both are in compliance with the regulations of PR Notice 91-2. Further, the physical or chemical hazards statement is in compliance with the regulations of 40CFR§156.10.
- 6b. The ingredient statement must be identical on both the label and CSF. Further, it is advisable to declare "Other Ingredients" on the label in lieu of "Inert Ingredients" as per the regulations of PR Notice 97-6.
- 6c. The applicant should be advised to delete the "ON Site" disposal in the "Storage and Disposal Statement" and emphasize "disposal in accordance with federal, state, or local procedures."
- 6d. Except for 6(c) above, the labeling storage and disposal instructions are appropriate and in compliance with the regulations of 40CFR§156.10.
- 7. Information pertaining to the corrosion characteristics of subject product, GRN 830-6320, is classified as a data gap.

CONCLUSIONS:

After resolving Findings 6(b), 6(c) & 7 above, we will have no objections for a FIFRA Section 3(c)(5) registration of subject product.

NOTE TO CRM:

The applicant should be advised to seek registration of the technical source, Prohexadione calcium [Cyclohexanecarboxylic acid, 3,5-dioxo-4-(1-oxopropyl)-,ion(1-)calcium, calcium salt], CAS #127277-53-6.